

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION OF COBRA ACQUISITIONS LLC REGARDING ITS
REQUEST TO BE HEARD AT THE MARCH 4-5, 2020 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

Cobra Acquisitions LLC (“Cobra”), by and through counsel, submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of March 4-5, 2020 Omnibus Hearing* (Dkt. No. 11729) (the “Order”), and respectfully states as follows:

1. Stephen M. Baldini and Philip C. Dublin of Akin Gump Strauss Hauer & Feld LLP, will appear at the March 4-5, 2020 Omnibus Hearing by video teleconference in Courtroom 17C

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007.

2. Fernando Van Derdys of Reichard & Escalera, LLC, will appear in person at the same hearing in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

3. Stephen M. Baldini intends to speak on Cobra's behalf in connection with Cobra's *Omnibus Objection to Fee Applications Filed by Professionals and Request to Increase Holdback Amount* (Case No. 17-bk-4780, Dkt. No. 1799) and the *Supplement to Omnibus Objection to Fee Applications Filed by Professionals and Request to Increase Holdback Amount* (Case No. 17-bk-4780, Dkt. No. 1860).

4. Cobra reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Cobra.

[Signature page follows]

DATED: February 28, 2020

Respectfully submitted,

REICHARD & ESCALERA, LLC <i>/s/ Rafael Escalera Rodríguez</i> Rafael Escalera Rodríguez USDC-PR No. 122609 escalera@reichardescalera.com <i>/s/Sylvia M. Arizmendi</i> Sylvia M. Arizmendi USDC-PR No. 210714 arizmendis@reichardescalera.com <i>/s/ Alana Vizcarrondo-Santana</i> Alana Vizcarrondo-Santana USDC-PR No. 301614 vizcarrondo@reichardescalera.com <i>/s/ Fernando Van Derdys</i> Fernando Van Derdys USDC-PR 201913 fvander@reichardescalera.com 255 Ponce de León Avenue MCS Plaza, 10th Floor San Juan, PR 00917-1913 Telephone: (787) 777-8888	AKIN GUMP STRAUSS HAUER & FELD LLP <i>/s/ Thomas P. McLish</i> Thomas P. McLish (<i>pro hac vice</i>) tmclish@akingump.com Scott M. Heimberg (<i>pro hac vice</i>) sheimberg@akingump.com Allison S. Thornton (<i>pro hac vice</i>) athornton@akingump.com 2001 K Street, N.W. Washington, DC 20006 Tel: (202) 887-4000 Fax: (202) 887-4288 and Ira S. Dizengoff (<i>pro hac vice</i>) Philip C. Dublin (<i>pro hac vice</i>) Stephen M. Baldini (<i>pro hac vice</i>) idizengoff@akingump.com pdublin@akingump.com sbaldini@akingump.com Akin Gump Strauss Hauer & Feld LLP One Bryant Park New York, New York 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002
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CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Fernando Van Derdys
USDC-PR 201913